

I. INTRODUCTION

To maximize the effectiveness of educating minors on Internet safety, the Commission's revision to § 54.520(c)(i) should require a school's Internet safety policy to include some form of parental education or outreach. Parents are uniquely situated to help their children make safer Internet choices. A lack of essential information, however, may hamper their ability to assist their children in these decisions. This information need not be extensive in order to be helpful. A very brief program during the school's open house or a simple, one page handout directing parents to helpful online and print resources could greatly enhance their awareness of and ability to deal with current dangers that minors face on the Internet.

II. THE REQUIRED INTERNET SAFETY POLICY SHOULD INCLUDE MANDATING SOME FORM OF PARENTAL EDUCATION OR OUTREACH

A. Parents Lack Information Regarding Potential Dangers Posed by the Internet

Even though parents are becoming increasingly technologically savvy, they still lack understanding regarding the true online threats that minors face. According to the Internet Safety Technical Task Force's final report to the Multi-State Working Group on Social Networking of State Attorneys General of the United States ("ISTTF Final Report"),¹ "parents generally believed that online issues of harassment, solicitation, and access to adult content were less prevalent than they actually were."² Furthermore, "parents also underestimated the amount

¹ BERKMAN CENTER FOR INTERNET & SOCIETY, ENHANCING CHILD SAFETY AND ONLINE TECHNOLOGIES: FINAL REPORT OF THE INTERNET SAFETY TECHNICAL TASK FORCE TO THE MULTI-STATE WORKING GROUP ON SOCIAL NETWORKING OF STATE ATTORNEYS GENERAL OF THE UNITED STATES (December 31, 2008), *available at* <http://cyber.law.harvard.edu/pubrelease/isttf/>.

² *Id.* at app. C at 44.

of adult content youth were exposed to either accidentally or deliberately and the amount of information adolescents posted online.”³

B. Educated Parents Provide More Individualized Instruction and Help to Their Children

Without understanding the true online threats that minors face, parents are less capable of utilizing the intimate relationship that they have with their children to keep them as safe as possible in their Internet activities. Younger children may have difficulty fully comprehending the instructions provided to them by the school. Parents who receive similar instructions can facilitate discussions with their children that will reinforce the principles taught by the school and clarify misunderstandings these children may have. This instruction can be much more individually tailored to the specific child’s personality and needs than general instruction received at school.

Parents are also in the best position to identify when their child may be suffering from the negative effects of Internet activity. Having a proper understanding of the full scope of dangers posed by the Internet enables a parent to link a child’s difficulties to the Internet in situations where this link would not be obvious to parents who are not educated on the subject. Early recognition of a problem increases the probability that parents can help the child successfully resolve the issue.

C. Educated Parents Encourage Increased Reporting

Educating parents may also help them understand why children do not report a significant number of online incidents and help their children feel more comfortable reporting incidents to them. The ISTTF Final Report states that “[o]nly around a third of those harassed reported the occurrence to a parent or guardian and less frequently told another adult such as a teacher.

³ *Id.* (citations omitted).

Wolak, Mitchell, and Finkelhor (2006) found that 63% did not report the incident because they thought it was ‘not serious enough.’”⁴ With this information, parents could be more proactive in encouraging their children to share potentially dangerous online incidents that the child may consider innocuous.

Moreover, “[e]ducation could help both youth and parents and guardians understand that stumbling onto sexual material is hard to avoid on the Internet and youth should be able to tell parents or guardians about such incidents without fear they will be blamed.”⁵ Parents who are more sensitive to this reality are better able to react to a child’s reporting in ways that will encourage future reporting.

III. CONCLUSION

Educating parents about the dangers that the Internet poses to their children and how to help their children cope with these realities enhances the effectiveness of the resources that a school is required to expend in educating their students about Internet safety. It does so without requiring significant added expense. Schools can easily translate the information taught to the children into materials appropriate for adults. In addition, all of the resources cited in this comment are available free online and many states and law enforcement agencies also provide free guides to parents regarding Internet safety.⁶

⁴ *Id.* (citations omitted).

⁵ JANIS WOLAK, KIMBERLY MITCHELL & DAVID FINKELHOR, ONLINE VICTIMIZATION OF YOUTH: FIVE YEARS LATER 34 (2006), *available at* <http://www.unh.edu/ccrc/pdf/CV138.pdf>.

⁶ *See e.g.*, U.S. DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION, A PARENT’S GUIDE TO INTERNET SAFETY, *available at* <http://www.fbi.gov/publications/pguide/pguidee.htm>.